



May 18, 2018

**VIA ECF**

The Honorable Michael A. Shipp, U.S.D.J.  
U.S. District Court for the District of New Jersey  
Clarkson S. Fisher Building and U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

**Re: Potter v. Valeant Pharmaceuticals International, Inc. et al.  
Master File No. 15-7658-MAS-LHG**

Dear Judge Shipp:

Consistent with the Court's April 20, 2018 Order (ECF. No. 309), the Class Plaintiffs, Opt-Out Plaintiffs,<sup>1</sup> and Defendants hereby submit this joint report. With the exception of certain matters, the cases are stayed pending the criminal trial against former Valeant employee, Gary Tanner, and former Philidor owner, Andrew Davenport. The trial began on May 3, 2018, and jury deliberations are anticipated to begin on Monday, May 21, 2018.

The parties propose to send the Court an update upon the conclusion of trial and have agreed among themselves that, so long as a verdict is reached in the criminal action, they will jointly propose to Your Honor that the stay be lifted within two weeks of that verdict. When the stay is lifted, the parties will promptly meet and confer on a schedule for the Court's review and will provide the Court with counsel's availability for a status conference in the related actions.

We are available at the Court's convenience to answer any questions.

Respectfully submitted,

*s/ Richard Hernandez*

Richard Hernandez

cc: All Counsel of Record (via ECF)

So Ordered this 21<sup>st</sup> day  
of May 20 18  
  
Hon. Michael Shipp, U.S.D.J.

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<sup>1</sup> The "Opt-Out Plaintiffs," as used herein, refers to the Plaintiffs in the following actions: No. 16-cv-05034; No. 16-cv-06127; No. 16-cv-06128; No. 16-cv-07212; No. 16-cv-07321; No. 16-cv-07324; No. 16-cv-07328; No. 16-cv-07494; No. 16-cv-07496; No. 16-cv-07497; No. 17-cv-06365; No. 17-cv-06513; No. 17-cv-07552; No. 17-cv-07625; No. 17-cv-07636; No. 17-cv-12088; No. 17-cv-12808; No. 17-cv-13488; No. 18-cv-00032; No. 18-cv-00089; No. 18-cv-00343; No. 18-cv-00383; No. 18-cv-00846; No. 18-cv-00893; No. 18-cv-01223; No. 18-cv-02286; No. 18-cv-08595. This list does not include *Hound Partners* (No. 18-cv-08705), which has been transferred to this Court but which declined to be listed here.